

**Comprehensive Exhibit to Renewal Application**

*Adherence to Minimum Operating Schedule.* WSIA, Facility ID No. 65557, Staten Island, New York (“WSIA” or “Station”), responded “Yes” to the certification that the licensee has not been silent (or operating for less than its prescribed minimum operating hours) for any period during 30 days. For clarity, WSIA notes that it satisfied the requirements of Section 73.561(a) at all times during its license term except during those periods of time when college stations are not required to operate (e.g., weekends, school vacations) and recess periods, including those periods where the College restricted access to campus and/or Station facilities due to COVID-19. *See* 47 C.F.R. § 73.561(a); Audio Division Announces Procedures Related to Coronavirus, Public Notice, DA 20-266 (rel. March 26, 2020) (explaining that the Audio Division classifies COVID-19 related school closures as a recess period consistent with section 73.561(a)).

*Discontinued Operations.* WSIA was off-air for slightly more than twelve months, from approximately March 15, 2020 until March 19, 2021, due to College closures resulting from the COVID-19 pandemic. The Station has requested that the Commission determine, under the provisions of Section 312(g) of the Communications Act of 1934, as amended, that equity and fairness would be served by WSIA being allowed to retain its license despite the Station being silent for slightly more than one year while the College was restricting access to its campus during the pandemic. *See* Letter to Mr. Albert Shuldiner, Chief, Audio Division, FCC from David Oxenford, Counsel to The College of Staten Island (dated Jan. 31, 2022) (“*Letter Request*”). To the extent necessary, for the reasons set forth in the Letter Request, the Station respectfully requests a waiver of Section 73.561(d) of the Commission’s rules.